EXHIBIT 25

Message

From: GRANETO, MATTHEW J [AG/1000] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=MJGRAN]
Sent: 4/4/2013 6:11:08 PM
To: KRONENBERG, JOEL M [AG/1000] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=501517]
Subject: APA inert study list
Attachments: APA submission.pdf

Joel,

The attached is a list of what was submitted in our last inert submission.

-Matt

From: LEMKE, SHAWNA LIN [AG/1000]
Sent: Thursday, April 04, 2013 12:57 PM
To: KRONENBERG, JOEL M [AG/1000]; GRANETO, MATTHEW J [AG/1000]
Cc: KAEMPFE, TERRY A [AG/1000]
Subject: RE: Monoethanolamine

Thanks, Joel.

[redacted]

From: KRONENBERG, JOEL M [AG/1000]
Sent: Tuesday, April 02, 2013 5:14 PM
To: GRANETO, MATTHEW J [AG/1000]; LEMKE, SHAWNA LIN [AG/1000]
Subject: Monoethanolamine

Current EPA guidance states that "inert ingredients do not have a required data set" (EPA, 2012) and that discussion with EPA should occur before submission. However, a 1987 Fed Reg notice states that the following mammalian tox studies are typically needed for a food-use inert:

- 90-day rat & dog
- 21/28-day dermal
- rat teratology

- genetox battery

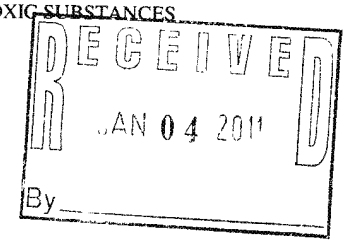
[redacted]

Joel

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

December 22, 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES



RUSSELL P. SCHNEIDER
MONSANTO COMPANY
MONSANTO COMPANY
1300 I STREET, NW, SUITE 450 EAST
WASHINGTON, DC 20005-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 10-DEC-10. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

INERT9

TRANSMITTAL DOCUMENT

SUBMITTED BY

Monsanto Company
800 N. Lindbergh Blvd. (C3NA)
St. Louis, MO 63167

REGULATORY ACTION IN SUPPPORT OF WHICH THE PACKAGE IS SUBMITTED

RD 1726 Inert Ingredient: Petition Proposing an Exemption from the Requirement of a Tolerance for Residues of Alkyl Amidodimethylpropyl Amine (AADPA) Surfactants in or on Raw Agricultural Products and Food Products

DATA GUIDELINES

Included on Data List Below

TRANSMITTAL DATE

September 13, 2010

SUBMISSION NUMBER

R.D. 1726, 20 Volumes, and (10 Toxicology Summaries of Parent Studies)

CD contains 3 zip files: 1 Cover Letter for 3 Zip Files (RD 1726, RD 1727, RD 1728)

1. RD 1726 Inert Ingredient: Proposal for Exemption from Tolerance, (MON 51803)
2. RD 1727 Application for New Registration, M1727 Herbicide, Glyphosate (MON 76186)
3. RD 1728 Application for New Registration, M1728 Herbicide, Glyphosate (MON 76337)

Volume No.	EPA Form No.	MRID No.	EPA REG. NO.	Administrative Materials
1		48117100		RD 1726 Transmittal Document
				RDs1726.1727.1728.CoverLetter (1 cover letter for 3 zip files)
				RD1726.TolerancePetition
				RD1726.NoticeofFiling (WORD file)
	8570-1			RD 1726 8570-1 Application
	8570-34			RD 1726 8570-34 Data Citation
	8570-35			RD 1726 8570-35 Internal Data Matrix
	8570-35			RD 1726 8570-35 Public Data Matrix
				E-PRISM RD1726.xml

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SUBMITTED DATA

Volume No.	Study Number	MRID No.	Author	Guideline	Title
2	MSL0022823	48117101	Probst, Donald A.	830 Series	RD 1726 Substance Characterization for MON 51803, a Surfactant to be used in Glyphosate Formulations
3	MSL0022503	48117102	Walsh, Kevin	835.1230	RD 1726 Adsorption/Desorption of [^{14}C] MON 51803 in Five Soils
4	MSL0022504	48117103	Grommes, Shannon; DiFrancesco Dale	835.2120	RD 1726 Hydrolysis of [^{14}C] MON 51803 in pH 4, pH 7 and pH 9 Buffered Water
5	MSL0022505	48117104	Herczog, Kimberly J.S.	835.4100	RD 1726 Rate of Degradation of [^{14}C] MON 51803 in Three Soils Under Aerobic Conditions
6	WL-2009-143	48117105	Minderhout, Tui; Kendall, Timothy Z.; Krueger, Henry O.	850.1010	RD 1726 A 48-Hour Static Acute Toxicity Test with the Cladoceran *(Daphnia magna)*
7	WL-2009-142	48117106	Minderhout, Tui; Kendall, Timothy Z.; Krueger, Henry O.	850.1075	RD 1726 A 96-Hour Static Acute Toxicity Test with the Rainbow Trout *(Oncorhynchus mykiss)*
8	WL-2009-146	48117107	Hubbard, Patrick M.; Beavers, Joann B.	850.2100	RD 1726 MON 51803: An Acute Oral Toxicity Study with the Northern Bobwhite
9	WL-2009-145	48117108	Hubbard, Patrick M.; Martin, Kathy H.; Beavers, Joann B.	850.2200	RD 1726 MON 51803: A Dietary LC50 Study with the Northern Bobwhite
10	WL-2009-144	48117109	Cartee, Tara L.; Kendall, Timothy Z.; Krueger, Henry O.; Porch, John R.	850.5400	RD 1726 MON 51803: A 96-Hour Toxicitiy Test with the Freshwater Alga *(Pseudokirchneriella subcapitata)*
11	EPS-08-495	48117110	Oley, S. Dana	870.1100	RD 1726 Acute Oral Toxicity Up and Down Procedure in Rats
12	EPS-08-496	48117111	Oley, S. Dana	870.1200	RD 1726 Acute Dermal Toxicity Study in Rats
13	EPS-08-497	48117112	Oley, S. Dana	870.2400	RD 1726 Primary Eye Irritation Study in Rabbits
14	EPS-08-498	48117113	Oley, S. Dana	870.2500	RD 1726 Primary Skin Irritation Study in Rabbits
15	EPS-08-499	48117114	Oley, S. Dana	870.2600	RD 1726 Dermal Sensitization Study in Guinea Pigs (Buehler Method)
16	WI-09-067	48117115	Haas, Matthew C.	870.3050	RD 1726 A 28-Day Oral (Dietary) Dose Range Finding Study in Rats with MON 51803
17	WI-09-120	48117116	Edwards, Tammye L.	870.3100 870.3650	RD 1726 90-Day/Reproductive and Developmental Toxicity Screening Study of MON 51803 in Rats
18	WI-09-206	48117117	Edwards, Tammye L.	870.3700	RD 1726 An Oral (Gavage) Range-Finding Prenatal Developmental Toxicity Study of MON 51803 in Rats
19	CV-09-081	48117118	Farabaugh, Christopher S.	870.5100	RD 1726 Bacterial Reverse Mutation Assay with a Confirmatory Assay
20	CV-09-082	48117119	Xu, Yong	870.5395	RD 1726 *In Vivo* Mouse Bone Marrow Micronucleus Assay

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STUDY CITED (Previous Submission by Akzo Nobel Technology & Engineering)

Volume No.	Study Number	MRID No.	Author	Guideline	Title
N/A	T09040 C	48205701	Van, Ginkel C.	835.3110	BIODEGRADABILITY OF AMIDES, C5-9, N-[3-(DIMETHYLAMINO-)PROPYL] (CAS 1044764-00-2) IN THE CLOSED BOTTLE TEST

10 TOXICOLOGY SUMMARIES of Parent Studies (10 WORD documents) (Same MRID Nos. as Parent Studies):

Volume No.	Study Number	MRID No.	Author	Guideline	Title
N/A	EPS-08-495	48117110	Kaempfe, Terry A.	870.1100	RD 1726 Summary: Acute Oral Toxicity Up and Down Procedure in Rats
N/A	EPS-08-496	48117111	Kaempfe, Terry A.	870.1200	RD 1726 Summary: Acute Dermal Toxicity Study in Rats
N/A	EPS-08-497	48117112	Kaempfe, Terry A.	870.2400	RD 1726 Summary: Primary Eye Irritation Study in Rabbits
N/A	EPS-08-498	48117113	Kaempfe, Terry A.	870.2500	RD 1726 Summary: Primary Skin Irritation Study in Rabbits
N/A	EPS-08-499	48117114	Kaempfe, Terry A.	870.2600	RD 1726 Summary: Dermal Sensitization Study in Guinea Pigs (Buehler Method)
N/A	WI-09-067	48117115	Hodge-Bell, Kimberly C.	870.3050	RD 1726 Summary: A 28-Day Oral (Dietary) Dose Range Finding Study in Rats with MON 51803
N/A	WI-09-120	48117116	Hodge-Bell, Kimberly C.	870.3100 870.3650	RD 1726 Summary: 90-Day/Reproductive and Developmental Toxicity Screening Study of MON 51803 in Rats
N/A	WI-09-206	48117117	Hodge-Bell, Kimberly C.	870.3700	RD 1726 Summary: An Oral (Gavage) Range-Finding Prenatal Developmental Toxicity Study of MON 51803 in Rats
N/A	CV-09-081	48117118	Hodge-Bell, Kimberly C.	870.5100	RD 1726 Summary: Bacterial Reverse Mutation Assay with a Confirmatory Assay
N/A	CV-09-082	48117119	Hodge-Bell, Kimberly C.	870.5395	RD 1726 Summary: *In Vivo* Mouse Bone Marrow Micronucleus Assay

COMPANY OFFICIAL:

Stephen A. Adams
Registration Manager
(314)694-9035

COMPANY NAME: Monsanto Company

ADDITIONAL COMPANY CONTACT: Russ Schneider, Ph.D. Russ Schneider, Ph.D.
Senior Director of US Regulatory Affairs and Public Policy
(202) 383-2866

INERT9

MONSANTO

November 17, 2010

Electronic Submission

Document Processing Desk (REGFEE) (E-SUB) (PETN)(APPL)
U.S. Environmental Protection Agency
Office of Pesticide Programs (7504P)
Room S-4900, One Potomac Yard (South Building)
2777 South Crystal Drive
Arlington, VA 22202

Attention: Dr. P. V. Shah, Branch Chief, Inert Ingredient Assessment Branch, Registration Division
Mr. James Tompkins, PM Team 25, Registration Division

Subject: **Monsanto Company Petition Proposing an Exemption from the Requirement of a Tolerance for Residues of Alkyl Amidodimethylpropyl Amine (AADPA) Surfactants in or on Raw Agricultural Products and Food Products;**
Request for Registration of Two End Use Products (M1727 Herbicide, EPA File Symbol 524-xxxxx and M1728 Herbicide, EPA File Symbol 524-xxxxx);
PRIA Category R 311 / R 311.2: New product; requires approval of new food-use inert

Dear Dr. Shah and Mr. Tompkins:

With this letter and attachments, Monsanto is requesting the establishment of an exemption from the requirement of a tolerance for a new inert and to allow the use of this inert in pesticide end use products intended for food uses. In association with the petition requesting the establishment of this tolerance exemption, Monsanto is also requesting registration of two end use products formulated with this new inert.

New Inert Tolerance Exemption Petition
Monsanto is submitting a petition for an exemption from the requirement of tolerance pursuant to section 408(d) (1) of the Federal Food, Drug, and Cosmetic Act under 40 CFR §180.910 [Amended], a, c, j (pre- and post-harvest uses) for the surfactants referred to under the general descriptor of C_3-C_{12} Alkyl Amidodimethylpropyl Amines (AADPAs).

Monsanto is supporting herein two Alkyl Amidodimethylpropyl Amine (AADPA) surfactants in the petition for a tolerance exemption:

CAS RN 1044764-00-2, Amides C5-C9, N-3-[(dimethylamino) propyl],
CAS RN 1044764-06-8, Amides C6-C12, N-3-[(dimethylamino) propyl]

A representative test compound, MON 51803, comprised of the C_5 – C_9 amides (CAS RN 1044764-00-2) was used to produce testing data to support this petition.

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AADPA surfactants are amides synthesized by reacting the dibasic (tertiary and primary) amine, dimethylaminopropylamine (DMAPA), with a mixture of linear saturated carboxylic acids of C_3-C_{12} carbon chain length. The two AADPA surfactants cited above are within the range of the carbon chain length of the proposed descriptor, and they demonstrate similar physicochemical properties and proposed mammalian metabolism.

By way of this petition, Monsanto is providing a 20-volume, comprehensive proprietary data package of toxicological testing (acute, repeat dose, genotoxicity and mutagenicity) and environmental safety studies (wildlife toxicology and environmental fate) for the representative test compound MON 51803 (CAS RN 1044764-00-2). This proprietary information and additional publicly available data (chemical identity, physical chemical calculations and mammalian metabolism), are intended to support a tolerance exemption for the AADPA surfactants when used as inert ingredients in pesticide formulations for 40 CFR §180.910 pre and post harvest uses. Monsanto asserts that the information provided herein is sufficient for EPA to conduct a FQPA safety assessment according to the criteria published in FR Notice Volume 71, No. 153, and that it demonstrates that the profile of the proposed new inert meets the current Office of Pesticide criteria for establishing the requested tolerance exemption.

End-Use Product Applications

As previously noted, in association with our petition requesting a tolerance exemption for the inert, we are requesting registration of two glyphosate end use products—M1727 Herbicide and M1728 Herbicide. Included in this submission are product chemistry and acute toxicology studies for each of these products. Please note that the glyphosate use pattern included in the labeling is identical to that already approved for similar Monsanto end use products containing glyphosate; therefore, the review of this submission can be accomplished within the Registration Division.

It should be noted that the eye irritation study submitted to support the registration of M1727 Herbicide was conducted on MON 76501 while the other acute toxicity, skin irritation and dermal sensitization studies were conducted on a different test substance, MON 76186. The compositions of MON 76501 and MON 76186 are greater than 99% identical, with the only difference being the presence of the two minor agents listed on the Confidential Statement of Formula (CSF) for M1787 Herbicide in MON 76186 that are not in MON 76501. Monsanto asserts that the presence or lack of these two components in such minor quantities would make no difference in the results of the eye irritation study and that the study supports the registration of M1787 Herbicide as defined on the CSF.

The Master Labels being submitted for consideration with these two registrations are identical and nearly identical to the Master Label accepted by the Agency for EPA Reg. No. 524-539 on September 20, 2010, with a few notable differences:

1. Directions for Use, page 13: While we feel that it is important to inform users of this product where to find supplemental labeling that may be necessary for the proper use of this product, we also realize that not all supplemental labeling is approved by the State Pesticide Lead Agency for use in all states, therefore, we have added the following statement to that affect: "Not all supplemental labeling is registered for use in all states. Check with the agency responsible for pesticide regulation in your State, your

Authorized Monsanto Retailer or a Monsanto Company Representative before using this product in accordance with any supplemental labeling."

2. Section 9.2, page 30: Added TripleFLEX herbicide to the list of tank-mix products for preplant, at-planting or preemergence application in corn. The active ingredients in this product (acetochlor, flumetsulam and clopyralid) were already listed on the Master Label for EPA Reg. No. 524-539.
3. Section 9.3, page 32: Added Warrant herbicide to the list of tank-mix products for preplant, at-planting or preemergence application in cotton. Acetochlor and flumioxazin were also added to the active ingredient list of this section.
4. Section 9.8, page 37: Added Authority XL herbicide to the list of tank-mix products for preplant, at-planting or preemergence application in soybean. The active ingredients in this product (sulfentrazone and chlorimuron-ethyl) were already listed on the Master Label for EPA Reg. No. 524-539.
5. Section 9.10.5, page 41: The voluntary 3-day restriction between application and planting eggplant, ground cherry, pepper (all), and tomatillo was extended to cover all fruiting vegetable crops listed in this section. Experience in the field has shown that this is the best practice for all fruiting vegetable crops, not just for the four previously listed.
6. Section 12.4, page 61: As in Section 9.2, added TripleFLEX herbicide to the list of tank-mix products for preplant, at-planting or preemergence application in corn. TripleFLEX and Warrant herbicides were also added to the list of tank-mix products for in-crop (postemergence) application.
7. Section 12.5, page 63: As in Section 9.3, added Warrant herbicide to the list of tank-mix products for preplant, at-planting or preemergence application in cotton.
8. Section 12.6, page 66: As in Section 9.3, added Warrant herbicide to the list of tank-mix products for preplant, at-planting or preemergence application in cotton.
9. Section 12.7, page 68: As in Section 9.8, added Authority XL herbicide to the list of tank-mix products for preplant, at-planting or preemergence application in soybean.
10. Section 12.8, page 70: As in Section 9.8, added Authority XL herbicide to the list of tank-mix products for preplant, at-planting or preemergence application in soybean.

For each end-use pesticide there is one Basic Formulation described on the Confidential Statement of Formula (CSF), EPA form 8570-4, and two Alternative Formulations designated A and B. Alternative Formulation A is identical to the Basic Formulation, except with two production facilities listed in box 2. It is our understanding that, according to EPA Policy, the Basic Formulation can only have one producing establishment listed; hence the creation of this Alternative Formulation. For both pesticide products, 99% of the composition of Alternative Formulation B is identical to the Basic Formulation, with only a minor adjustment in one or two components. It would not be expected that these minor adjustments in the formulation would significantly alter the acute toxicity findings or product chemistry endpoints reported here, and therefore, we assert that the data submitted herein support these Alternative Formulations as well.

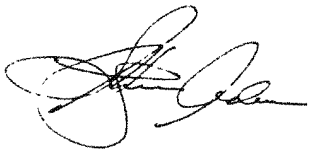
Attachments

The following are included in the EPA portion of the electronic submission in association with the petition for the tolerance exemption for the new food use inert request and for the registration of two new end use products:

- Petition for an exemption from the requirement of a tolerance for all agricultural commodities for CAS RN 1044764-00-2, Amides C5-C9, N-3-[(dimethylamino) propyl], MON 51803 and CAS RN 1044764-06-8, Amides C6-C12, N-3-[(dimethylamino) propyl] under 40 CFR §180.910.
- EPA Form 8570-1 Application for Pesticide Registration, EPA Form 8570-4 Confidential Statement of Formula, and proposed labeling for M1727 Herbicide and M1728 Herbicide, the two end use products for which we are seeking registration.
- Copy of proof of the PRIA payments. Following the guidance communicated by OPP for primary : secondary registration applications, the PRIA fee for the first end use product registration request under category R 311 (New product; requires approval of new food-use inert; applicant-initiated; excludes approval of safeners) is $17,133,, while the second end-use product PRIA fee is $4,800. (R311.2 - Primary Application for new registration; includes submission of required data). EPA Form 8570-34 and 8570-35, Certification with Respect to Citation of Data and Data Matrix for glyphosate and its salts and for the studies supporting the new inert ingredient. Please note that separate data matrices are being provided for the proposed new food use inert and for the two end use products for which we are seeking registration.
- Three (3) transmittal documents—one for the 20 volumes being submitted to support the tolerance exemption request, one for the 8 volumes supporting the registration of M1727 Herbicide, and one for the 8 volumes supporting the registration of M1728 Herbicide.

If you should have any questions regarding this proposed new food inert or our requests to register two new end-use products, please contact me at 314.694.9035 or 314.452.2782, or by electronic mail at stephen.a.adams@monsanto.com , or Dr. Russell P. Schneider at 202.383.2866.

Sincerely,



Stephen A. Adams
Registration Manager, Glyphosate

CD & Cover Letter enclosed (e:prism submission)

